

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION

KIMBERLY and JOHN STAPLES,

Plaintiffs,

v.

Case No: 7:18-cv-00160-LSC

H. WALKER ENTERPRISES, LLC,
RENAISSANCE MAN FOOD
SERVICES, LLC, and SIMMONS

Defendants.

**DECLARATION OF STEVE GARDNER IN SUPPORT
OF DEFENDANT SIMMONS PREPARED FOODS, INC.'S
MOTION FOR SUMMARY JUDGMENT**

1. My name is Steve Gardner. I am over 21 years of age and am fully competent to make this declaration. I have personal knowledge of all facts recited herein and state that such facts are true and correct.

2. I was formerly the Vice President of Human Resources for Simmons Prepared Foods, Inc. ("Simmons").

3. I interacted with John Staples ("Mr. Staples") during his employment with Simmons.


4. Mr. Staples was hired as an at-will employee, and he continued to be employed on an at-will basis throughout the duration of his employment with Simmons.

5. I never told Mr. Staples that he could only be fired from Simmons for good cause.

6. I also never told Mr. Staples that Simmons was going to protect him from Herschel Walker.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 13, 2019.



Steve Gardner